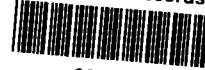




217/732-6762

Refer to: 0311020001 -- Cook County
Krohn Landfill
CERTIFICATION OF CLOSURE
Log No. 1990-317
Permit File

EPA Region 5 Records Ctr.



298140

October 26, 1990

Krohn Development Corp.
Attn: Richard Krohn
950 Milwaukee Avenue
Glenview, Illinois 60025

Dear Mr. Krohn:

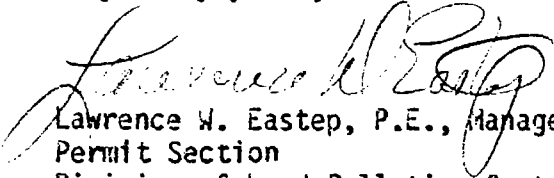
This will acknowledge receipt of your certification of completion of closure dated June 30, 1990 and received by this Agency July 5, 1990.

A. Certification of Closure

1. The Agency has determined that the referenced site has been closed in accordance with the Closure Certification.
2. The five year post-closure care period began June 30, 1990.

This correspondence constitutes final action for Log No. 1990-317.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CL:bjh/3424n/1

cc: Maywood Region
John W. Thorsen, P.E.; Weston
Division File
Susan M. Franzetti; Gardner, Carton & Douglas
Mike Walwer
John Taylor

STATE PERMIT LOG NO. : 1990-317
NAME : KROHN LANDFILL
OWNER : KROHN DEVELOPMENT CORP

STATUS : I
SITE NO. : 0311020001

COUNTY : COOK

CITY : GLENVIEW

PERMIT TYPE : CL-CERT

REVIEWER : CJL

FACILITY TYPE : LF

WASTE TYPE : NH

RECEIVED : 90/07/05 DUE: 90/11/20

MAILED : 90/10/26

FINAL ACTION : ISSUED

WAIVER : 90/10/09

CLOSURE PLAN SUBM'T:

NOTIFY IHPA:

REG. POLL. CONTROL:

FINAN. ASSUR. SUBM'T:

NOTIFY APC:

SITING APP'D:

CROPA:

NOTIFY PWS:

NOTIFY WPC:

NOTIFY ENF: Y

NOTIFY CMS: Y

NOTIFY LOCAL OFFICIALS:

NOTIFY FOS: Y

NOTIFY DOT :

NOTIFY AGRI:

NOTIFY ISGS:

NOTIFY CONSER.:

NOTIFY DELEGATED COUNTY:

NOTIFY DENR:

PRE-OP MEMO SENT:

COMMENTS:

Due 8
4

Maywood

STATE PERMIT LOG NO. : 1990-317
NAME : KROHN LANDFILL
OWNER : KROHN DEVELOPMENT CORP
STATUS : A
SITE NO. : 0311020001

COUNTY : COOK
CITY : GLENVIEW

PERMIT TYPE : CL/CERT
REVIEWER : CTL

FACILITY TYPE : LF
WASTE TYPE : NH

RECEIVED : 90/07/05 DUE : 90/09/03
MAILED :

FINAL ACTION :
WAIVER :

CLOSURE PLAN SUBM'T:
REG. POLL. CONTROL:
FINAN. ASSUR. SUBM'T:
SITING APP'D:

NOTIFY APC:	NOTIFY FWS:	NOTIFY WPC:
CROPA:	NOTIFY ENF: Y	NOTIFY CMS: Y
NOTIFY LOCAL OFFICIALS:	NOTIFY FOS: Y	NOTIFY DOT :
NOTIFY AGRI:	NOTIFY ISGS:	NOTIFY CONSER.: RECEIVED
NOTIFY DELEGATED COUNTY:	NOTIFY DENR:	PRE-OP MEMO SENT:

13 AUG 1990

COMMENTS:

IEPA/DLPC

The Landfill is covered; however the depth of final cover could not be determined during the 8-7-90 site inspection because the site operator refused to dig inspection holes.

- Note that Gary Deigan of Weston 1st stated that test holes were put in on a 100' grid. He was corrected by Joe Pierro of Krohn per who stated that 1 boring per acre (60) was used.

RECEIVED
JUL

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

- J. Thorsen of Weston certified on March '90 cover at only 25 borings covering, at most, the southern 2/3 of the site.
- The 6-30-90 letter from Weston to Enstop states that only 9 holes were checked for depth of cover. These holes were different from Thorsen's certified holes.
- The 11-2-89 Patrick Engineering report seems to show data for 39 borings.

Due 8/4

Maywood

STATE PERMIT LOG NO. : 1990-317
NAME : KROHN LANDFILL
OWNER : KROHN DEVELOPMENT CORP

STATUS : A
SITE NO. : 0311020001

COUNTY : COOK

CITY : GLENVIEW

PERMIT TYPE : CL/CERT

REVIEWER : CJL

FACILITY TYPE : LF

WASTE TYPE : NH

RECEIVED : 90/07/05 DUE: 90/09/03

MAILED :

FINAL ACTION :

WAIVER :

CLOSURE PLAN SUBMIT:
REG. POLL. CONTROL:
NOTIFY APC:
CROPA:
NOTIFY LOCAL OFFICIALS:
NOTIFY AGRI:
NOTIFY DELEGATED COUNTY:

NOTIFY PWS:
NOTIFY ENF: Y
NOTIFY FOS: Y
NOTIFY ISGS:
NOTIFY DENR:

FINAN. ASSUR. SUBMIT:
SITING APP'D:
NOTIFY WPC:
NOTIFY CMS: Y
NOTIFY DOT:
NOTIFY CONSER.:
PRE-OP MEMO SENT:

RECEIVED

13 AUG 1990

COMMENTS:

IEPA/DLPC

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RECEIVED

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

STATE PERMIT LOG NO. : 1990-317
NAME : KROHN LANDFILL
OWNER : KROHN DEVELOPMENT CORP

STATUS : A
SITE NO. : 0311020001

COUNTY : COOK

CITY : GLENVIEW

PERMIT TYPE : CL/CERT

REVIEWER :

FACILITY TYPE : LF

WASTE TYPE : NH

RECEIVED : 90/07/05 DUE: 90/09/03

MAILED :

FINAL ACTION :

WAIVER :

CLOSURE PLAN SUBM'T:

FINAN. ASSUR. SUBM'T:

REG. POLL. CONTROL:

SITING APP'D:

NOTIFY APC:

NOTIFY PWS:

NOTIFY WPC:

CROPA:

NOTIFY ENF: Y

NOTIFY CMS: Y

NOTIFY LOCAL OFFICIALS:

NOTIFY FOS: Y

NOTIFY DOT :

NOTIFY AGRI:

NOTIFY ISGS:

NOTIFY CONSER.:

NOTIFY DELEGATED COUNTY:

NOTIFY DENR:

PRE-OP MEMO SENT:

COMMENTS: Four new wells have been added to the existing seven.
Initial water quality is to be reported and analyzed for with 3104-112 quarterly for
the first year. Subsequent to SP granted to Krohn-F on June 12, 1990.
Two sampling events are in place. (12/90) r. 10



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

County Cook Site Code 0311020001
Facility Krubn Region Ma Date Aug 7 1990
Time: From 1:10 P m To 2:30 P m Photos Taken: Yes ☒ (#) No ()
Site Open: Yes () No ☒ Inspector(s) Charles Grouman
Samples Taken: Yes (#) No ☒ Groundwater (#) Surface (#) Other (#)
Interviewed Joe Pierre Weather 75°F sunny Facility Phone No. 708/699-7730

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()	Sanitary Landfill <input checked="" type="checkbox"/>	EPA OP Permit No. <u>1973-68-0P</u>
Temporarily Closed ()	Special Waste Landfill ()	EPA DE Permit No. <u> </u>
Closed not Covered <input checked="" type="checkbox"/>	Quantity Received Daily	Other <u> </u>
Closed and Covered ()	(1-6) <u>0</u>	None <u> </u>

Final Cover Applied.

ICPA reviewing certification. SITE OBSERVATION

Failure to comply with the terms and conditions of permit(s)

(Section 807.302 of the Regulations) 1.

Failure to deposit refuse in the toe of the fill or into the bottom of the trench (Section 807.303(a) of the Regulations) 2.

Inadequate spreading and compacting (Section 807.303(b) of the Regulations) 3.

Failure to maintain the proper ratio of the slope of the working face (Section 807.303(c) of the Regulations)..... 4.

Insufficient operable equipment (); personnel (); supervision () available to comply with the permit, the Act or the Regulations (Section 807.304 of the Regulations) 5.

Uncovered refuse remaining from any previous operating day or at the conclusion of any operating day (Section 21(p)(5) of the Act) 6.*

Inadequate depth of daily cover (Section 807.305(a) of the Regulations) ... 7.

Inadequate depth of intermediate cover (Section 807.305(b) of the Regulations) 8.

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17 AUG 1990

IEPA/DLPC

Kruh
8-7-90

- Inadequate depth of final cover (Section 807.305(c) of the Regulations) ... 9. _____ *
- Failure to provide final cover within time limits established by Board Regulations
(Section 21(p)(6) of the Act and Section 807.305(c) of the Regulations) ... 10.* _____
- Failure to collect and contain litter from the site by the end of each operating day
(Section 21(p)(12) of the Act and Section 807.306 of the Regulations) 11.* _____
- Causing or allowing salvaging: in an unsanitary manner (); in an area not remote from the operating face (); which interferes with or otherwise delays the operation of the landfill (); without removing salvaged materials daily or separating such materials by type and storage so as to create a nuisance, vector harborage or unsightly appearance () (Section 807.307 of the Regulations) 12. _____
- Causing or allowing scavenging operations
(Section 21(p)(8) of the Act and Section 807.308 of the Regulations) ... 13.* _____
- Causing or allowing feeding of farm or domestic animals upon the site of the sanitary landfill or with refuse delivered thereto
(Section 807.309 of the Regulations) 14. _____
- Improper deposit, acceptance or handling of burning material at a sanitary landfill site (Section 807.310(a) of the Regulations) 15. _____
- Acceptance of wastes without necessary permits
(Section 21(p)(7) of the Act and Section 807.310(b) of the Regulations) ... 16.* _____
- Open burning of refuse in violation of: Section 9 of the Act ();
Section 807.311 of the Regulations () (Section 21(p)(4) of the Act) 17.* _____
- Causing or allowing the operation of a sanitary landfill so as to cause or threaten or allow the emission of contaminants so as to cause or tend to cause air pollution in Illinois
(Section 9(a) of the Act and Section 807.312 of the Regulations) 18. _____
- Causing or allowing the operation of a sanitary landfill so as to cause or threaten or allow the discharge of any contaminants so as to cause water pollution in Illinois
(Section 12(a) of the Act and Section 807.313 of the Regulations) 19. _____
- Conducting a sanitary landfill operation in a manner which results in leachate flow entering Waters of the State (Section 21(p)(2) of the Act and Sections 807.313 and 807.314(e) of the Regulations) 20.* _____
- Conducting a sanitary landfill operation in a manner which results in leachate flows exiting the landfill confines (Section 21(p)(3) of the Act and Sections 807.313 and 807.314(e) of the Regulations) 21.* _____

-2-

* watch erosion or
it will develop into
a violation.

(45)



DATE: August 8, 1990
TO: Division File
FROM: *CG* Chuck Gruntman, LPC, FOS, Maywood
SUBJECT: 0311020001 - Cook
Krohn Landfill
FOS

On August 7, 1990 I stopped at the subject site to inspect the landfill and confirm that cover had been placed over the entire site. I met with Joe Pierro, the site manager, and Gary Deigan of Weston, Inc., from the site's engineering firm. They both accompanied me on the inspection.

The site had ceased accepting waste over a year ago and has certified that over 2 feet of final cover has been applied.

I walked the site. My inspection revealed that the entire site was covered. The depth of final cover could not be determined during this inspection, however, because the site operator refused to excavate test holes. It is the operator's contention that their engineer's certification of the depth is adequate for closure.

The majority of the site has an established vegetative cover. The remaining area has been newly seeded and has a vegetative growth of about two inches.

Three areas of erosion were identified during the inspection. These areas should be addressed before the erosion gullies cut completely thru the cover.

No violations were observed and the site appeared to be in compliance.

CG:lb:06251

Krohn
8-7-90

Acceptance of special waste for disposal, storage or treatment from a waste hauler that did not present a signed manifest which designated the receiver's facility as a destination for the special waste (Section 809.302(a) of the Regulations) 39. _____

Failure to have financial assurance documents (Section 807.601 of the Regulations) 40. _____

Failure to file: a closure plan (); post-closure plan () (Sections 807.503 and 807.523 of the Regulations) 41. _____

Failure to properly carry-out: closure plan (); post-closure plan () (Sections 807.506 and 807.524 of the Regulations) 42. _____


Apparent violation of: PCB (); Circuit Court () Case Number _____, Order entered on _____, 19 _____ 43. _____

Other 44. _____

No violations observed.

INFORMATIONAL NOTES

1. References to "Act" herein refer to the Illinois Environmental Protection Act: Ill. Rev. Stat. ch. 111 1/2, par. 1001, et seq.
2. References to "Regulations" herein refer to the rules and regulations of the Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusion of the Agency or as limiting the Agency's statutory or regulatory powers.
- *. Subject to enforcement either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.


Signature of EPA Inspector(s)

GDS:BB:tk:3/2/11(9/18/86)

Krchn
8-7-90

- Inadequate: shelter (); sanitary facilities (); emergency communi-
cations () for employees (Section 807.314(a) of the Regulations) 22. _____
- Inadequate roads within the site (Section 807.314(b) of the Regulations) .. 23. _____
- Inadequate control of access to site
(Section 807.314(c) of the Regulations) 24. _____
- Inadequate measures for fire protection
(Section 807.314(d) of the Regulations) 25. _____
- Inadequate measures to monitor and control leachate
(Section 807.314(e) of the Regulations) 26. _____
- Inadequate measures to control: dust (); vectors ()
(Section 807.314(f) of the Regulations) 27. _____
- Failure to have an operational safety program approved by the Agency
(Section 807.314(g) of the Regulations) 28. _____
- Inadequate provision for concealing sanitary landfill operations from
public view (Section 807.314(h) of the Regulations) 29. _____
- Causing or allowing development or operation of a sanitary landfill with-
out having proven to the Agency's satisfaction that no damage or hazard
will result to Waters of the State (Section 807.315 of the Regulations) ... 30. _____
- Failure to monitor: gas (); water (); settling () after the site is
completed or closed (Section 807.318(a) of the Regulations) 31. _____
- Failure to take necessary remedial action to abate any gas ();
water (); settling () problems after the site is completed or closed
(Section 807.318(b) of the Regulations) 32. _____
- Failure to properly file a detailed description of the site upon completion
or closure of the site (Section 807.318(c) of the Regulations) 33. _____
- Refuse in standing or flowing water (Section 21(p)(1) of the Act) 34.* _____
- Deposition of refuse in any unpermitted portion of the landfill
(Section 21(p)(9) of the Act) 35.* _____
- Acceptance of special waste without a required manifest
(Section 21(p)(10) of the Act) 36.* _____
- Failure to submit reports required by permits or Board Regulations
(Section 21(p)(11) of the Act) 37.* _____
- Acceptance of special waste for disposal, storage or treatment from a
waste hauler that does not have a valid special waste hauling permit
(Section 809.302(a) of the Regulations) 38. _____



CHESTNUT CLOSURE FACILITY
GROUNDWATER MONITORING WELL LOCATION

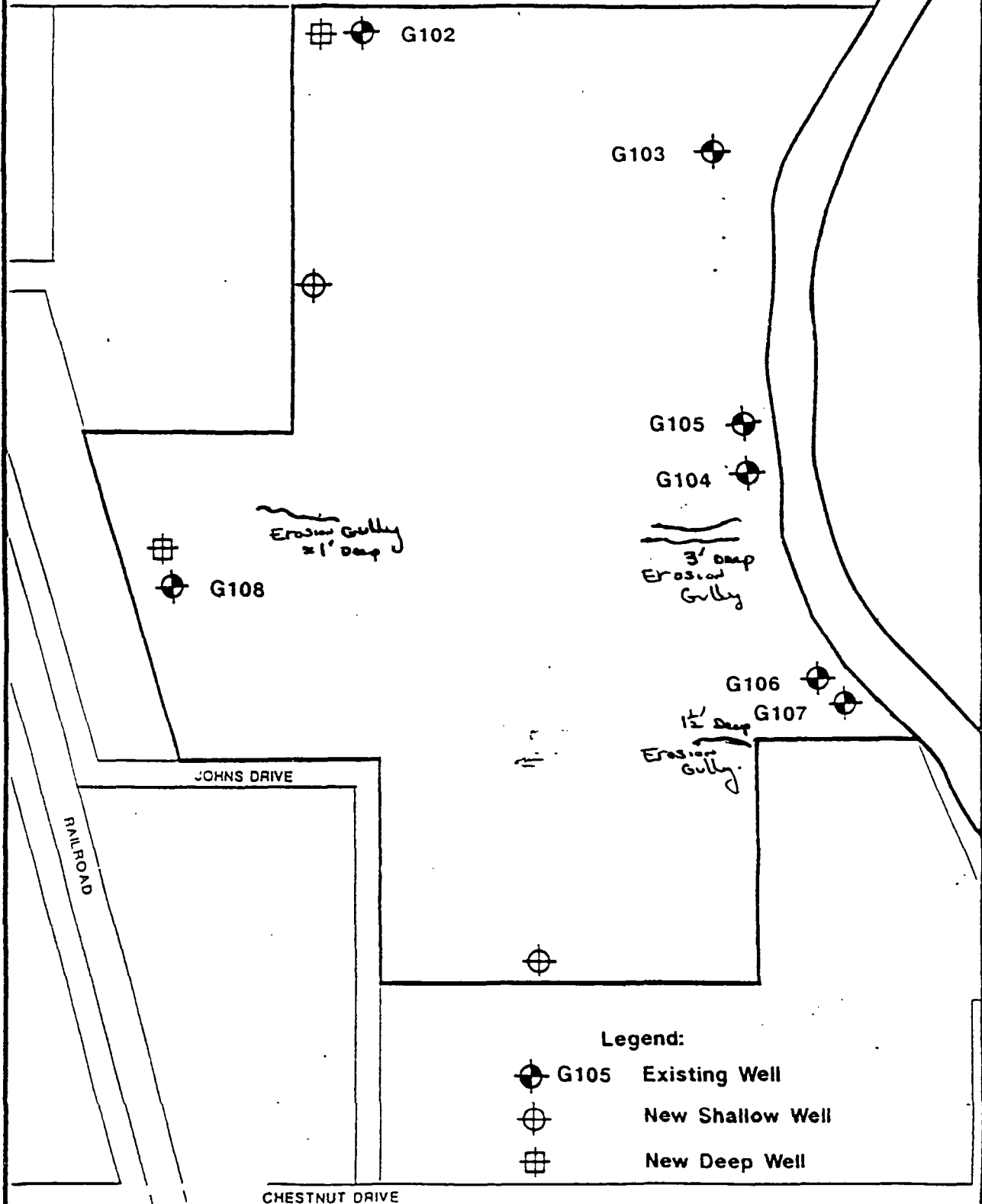
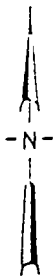


FIGURE 1 - LOCATIONS OF MONITORING WELLS

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357
ADM 39
054-002

Subject Krohn LF Closure Cert, Log No. 1990-317

Data Review Notes

Reviewed by CJI

Date 9/20/90

I. CLOSURE CERTIFICATION

This submittal certifies closure of Krohn Landfill. Although, in his comments received 8/13/90 Chuck Gruntman expressed some concerns his report received on ~~8/13/90~~ 8/17/90 and dated 8/13/90 says that the site is closed and covered. My review of the original ~~and~~ submittal and additional information indicates that the certification is adequate and complete. Therefore, I am recommending that this certificate of closure be issued.

Subject Review Notes for 1988-281-SP
Data Krohn LF
Reviewed by CJL

Date 6/28/89

SITE HISTORY

~1900-~1940... Site was excavated so the clay could be used to make brick by Lutter Brick Company.

~1945-1962... Municipal and industrial wastes were disposed by Metropolitan Disposal Company. (Division File indicates that the excavation was flooded 1950.)

1962-1973... Under the terms of a 8/11/62 Cook County Circuit Court Settlement agreement, earth, concrete and bricks were disposed.

2/26/74... Permit No. 1973-68-OP was issued to Land & Lakes Company (James Cowhey) to operate a land fill for "solid, non-putrescible, non-combustible fill". were transferred

6/30/81... Permit Nos. 1973-68-OP and 1973-68-DE¹ from Land & Lakes to Richard Krohn. (It appears that 1973-68-DE had not been issued prior to this.)

8/13/82... Supplemental Permit 1982-83 was issued, approving a "closure plan", and gas vents and a groundwater monitoring program. The application for this permit seems to have been in response to pressure from the City of Glenview.

8/23/82... A letter, similar to our present Attachment A's for groundwater monitoring program, was sent from the Agency to Krohn.

7/20/83... The Agency denied an application to reduce the number of groundwater monitoring wells and gas vents. The basis for the proposed reduction (dated 4/21/83, Ltr. No. 409)

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

L 532-0357
ADM 39
054-002

Project Review Notes for 1988-291-SP

Site Krohn LF

Reviewed by CJL

Date 6/28/89

PERMIT HISTORY

- 7/20/83 . . . was that the waste being disposed at that time was so innocuous that less^{than} normal~~ly~~ stringent monitoring was necessary.
- 4/5/84 . . . IPCB dismissed Krohn's appeal of the Agency's 7/20/83 denial at Krohn's request
- 1/2/84 . . . The Agency denied Krohn's application (Log No. 709) to completely eliminate the requirement in Permit No. 1982-83 for the installation of gw monitoring wells and gas vents. Krohn is currently appealing this denial to IPCB.
- 1/6/84 . . . The Agency denied Krohn's application (Log No. 1984-812) requesting Permit Nos. 1973-68-DE & 1973-68-OP be transferred from Richard Krohn to Krohn Development Corporation.
- ~~1/2/87 . . . The Agency deemed Log No. 1987-125 not filed because the application did not include a c/p/c/p plan, cost estimates or financial assurance. The application requested modifications in the construction specifications for the groundwater monitoring program.~~
- 1/21/87 . . . At the request of IEPA, Enforcements (Don Gimbel and IAGD (Matt Dunn) a letter stating the proposal made in Log No. 1987-125 did not require permit.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357
ADM 39
054-002

Subject Krohn LF
Data Review Notes
Reviewed by CJL

Date 10/26/90

- 1988 -- Appl. # 1988-102 (proposing gw monitoring program, cl/p-cl care plan, gas migration control system, and transfer of permit from Richard Krohn to Krohn Development) denied due to deficiencies in gw monitoring program and cl/p-cl care proposal.
- 1989 -- 1989-281-SP was issued approving the proposals made in application 1988-102.
- 10/26/90 -- Certification of Closure (1990-317) issued
Date of Closure: 6/30/90
Length of Post-Closure Care: 5 years.



100 CORPORATE NORTH, SUITE 101
ROUTE 22 AND LAKESIDE DRIVE
BANNOCKBURN, ILLINOIS 60015
(312) 295-6020

Mr. Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency

30 June 1990

Re: 0311020001 - Cook County
Krohn Landfill (Lutter Brick Landfill)
Supplemental Permit No. 1988-281-SP
Certification of Closure

Dear Mr. Eastep:

The Krohn Development Corporation has completed all closure activities at the Krohn Landfill. The purpose of this transmittal is to forward the "Affadavit for Cerification of Closure of Non-Hazardous Waste Facilities" (LPC 282 6/88) by the operator and professional engineer, as well as an affadavit and Addendum A to this certification entitled "Documentation of Partial Closure as of 8 March 1990."

In the course of implementing Section 8.c, Testing Procedure to Insure Design Specifications, of the approved Closure Plan, Krohn Development Corporation utilized an alternate procedure from that described in the Closure Plan. This was described to Mr. Christopher Liebman of the IEPA on 29 June 1990 and was verbally approved. (The Phone Conversation Record for this verbal approval is attached.) This alternative procedure involved the method of measuring the thickness of the clay cap. Originally it was envisioned that a three foot long continuous tube sampler would be pushed through a hollow stem auger. The alternative approach included the pushing of two 2 foot long Shelby tubes consecutively into the ground at each sampling location to obtain a four foot deep sample with which to measure the thickness of the clay cap at nine location as discussed with Mr. Leibman on 25 May 1990 (115, 122, 128, 142, 165 and 158, 159, 160 and 161).

The above-noted information, as well as geotechnical laboratory data from Patrick Engineering Company (which is to follow) provides the necessary documentation to demonstrate that the Krohn Development Corporation has met the clay cap specifications.

Mr. Thorsen's site visit and spot check of the topsoil thickness confirms this aspect of the final cover compliance. This visit

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, also confirmed the presence of grass seed and straw mulch across the previously unvegetated areas of the final cover system.

Enclosed with this filing is proof that a description of the site, including a plat, has been filed with the appropriate county land recording authority per 35 IAC 807.318(c). In addition, Three copies of the proof of financial assurance, originally filed as part of the Closure Plan, are included in this submittal. The cost estimate was done in accordance with 35 IAC 807.662 and the appropriate financial instrument was filed on original agency forms.

If you have any questions regarding this Certification, please do not hesitate to contact Mr. Thorsen at 708/918-4000.

Very truly yours,
Roy F. Weston, Inc.

A handwritten signature in black ink, appearing to read "John W. Thorsen". The signature is fluid and cursive, with a large initial "J" and "W".

John W. Thorsen, P.E.
Project Director

enclosures

JWT:jt

ADDENDUM A TO

CLOSURE/POST-CLOSURE CARE PLAN

KROHN LANDFILL

DOCUMENTATION OF PARTIAL CLOSURE

AS OF 8 MARCH 1990

MARCH 1990

Prepared by:

Roy F. Weston, Inc.
100 Corporate North, Suite 101
Bannockburn, Illinois 60015

G2067

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JUL 05 1990

IEPA-DLPC

ADDENDUM A TO
CLOSURE/POST-CLOSURE CARE PLAN
KROHN LANDFILL

DOCUMENTATION OF PARTIAL CLOSURE
AS OF 8 MARCH 1990

Introduction

The purpose of this Addendum is to provide documentation of the thickness, compaction and permeability of in-place cover at Krohn Landfill. This documentation is based on implementation of the testing procedures proposed for verification of cover construction in Section 8.c. of the Closure/Post-Closure Care Plan. The results of field and laboratory testing presented in this Addendum are based on verbal communication with and reports from Patrick Engineering, Inc.

Review of Testing Procedures

A program of soil borings and laboratory testing was used to verify the thickness, compaction, and hydraulic performance of the clay cover. Soil borings were drilled to a depth of three feet at the rate of one boring per acre. The locations of the borings are shown in the attached map, Plate 1. The borings were drilled with hollow-stem augers and a Shelby tube was pushed from a depth of one to three feet, allowing direct measurement and visual verification of clay thickness. All holes into/through the cover were backfilled with a bentonite-rich grout.

Laboratory testing proceeded in three steps. The first step consisted of Atterberg Limits, moisture, and in-situ density testing of material from the Shelby tube. The Atterberg Limit data were plotted on an A-line diagram, and a determination of the number of different soil types was made. In the second step, a Standard Proctor test was performed for each type of clay soil using mixed material from the Shelby Tube samples comprising that soil type. The moisture and density data for the cover soils (determined from the Shelby tube samples) was compared with the Proctor test results to confirm cover compaction. The third step consisted of hydraulic conductivity testing of recompacted samples representative of

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JUL 05 1990
IEPA-DLPC

field conditions for each type of clay. The Proctor test results and field moisture/density data were used to select moisture and density criteria for the recompacted samples used in hydraulic conductivity testing.

Characterization of Cover Soils

The Atterberg Limits testing showed that six types of clay soil are present in the area represented by the 25 soil borings. These data are presented below by soil type:

- Clay Soil A

<u>Boring No.</u>	<u>Liquid Limit</u>	<u>Plastic Limit</u>	<u>Plasticity Index</u>
B-130	36	19	17
B-151	36	20	16
B-162	35	18	17
B-169	36	19	17

- Clay Soil B

<u>Boring No.</u>	<u>Liquid Limit</u>	<u>Plastic Limit</u>	<u>Plasticity Index</u>
B-113	37	19	18
B-120	37	19	18
B-121	39	20	19
B-144	37	20	17

- Clay Soil C

<u>Boring No.</u>	<u>Liquid Limit</u>	<u>Plastic Limit</u>	<u>Plasticity Index</u>
B-114	33	19	14
B-139	33	18	15
B-147	30	17	13
B-153	31	16	15
B-163	33	18	15

- Clay Soil D

<u>Boring No.</u>	<u>Liquid Limit</u>	<u>Plastic Limit</u>	<u>Plasticity Index</u>
B-124	30	17	13
B-143	33	18	15
B-150	30	16	14
B-166	32	19	13

- Clay Soil E

<u>Boring No.</u>	<u>Liquid Limit</u>	<u>Plastic Limit</u>	<u>Plasticity Index</u>
B-112	27	17	10
B-134	26	15	11
B-154	25	14	11
B-167	27	15	12

- Clay Soil F

<u>Boring No.</u>	<u>Liquid Limit</u>	<u>Plastic Limit</u>	<u>Plasticity Index</u>
B-123	25	15	10
B-132	25	16	9
B-133	27	16	11
B-148	26	16	10

All six clay soil types are classified as "CL" within the Unified Soil Classification System.

Standard Proctor density tests were performed on composited soil samples for each type of clay soil. These data are presented below:

- Clay Soil A

- Maximum Density 112.4 pcf (lbs/ft³)
- Optimum Moisture 16.3 percent

- Clay Soil B

- Maximum Density 114.9 pcf
- Optimum Moisture 14.2 percent

- Clay Soil C
 - Maximum Density 115.2 pcf
 - Optimum Moisture 14.0 percent
- Clay Soil D
 - Maximum Density 114.4 pcf
 - Optimum Moisture 15.4 percent
- Clay Soil E
 - Maximum Density 119.5 pcf
 - Optimum Moisture 13.2 percent
- Clay Soil F
 - Maximum Density 115.9 pcf
 - Optimum Moisture 14.5 percent

In-Place Cover Conditions

The soil borings show that there is at least two feet of clay cover at each of the 25 soil boring locations. In-place density and natural moisture content were measured from samples extruded from the 25 Shelby tubes. These data are presented below by soil type:

- Clay Soil A

<u>Boring No.</u>	<u>In-Place Density</u>	<u>Natural Moisture</u>
B-130	110.8 pcf	19.0%
B-151	116.2 pcf	7.3%
B-162	110.7 pcf	15.6%
B-169	115.9 pcf	8.9%

- Clay Soil B

<u>Boring No.</u>	<u>In-Place Density</u>	<u>Natural Moisture</u>
B-113	109.2 pcf	17.9%
B-120	110.4 pcf	18.7%
B-121	105.1 pcf	22.5%
B-144	106.0 pcf	16.8%

- Clay Soil C

<u>Boring No.</u>	<u>In-Place Density</u>	<u>Natural Moisture</u>
B-114	118.0 pcf	14.7%
B-139	118.5 pcf	13.6%
B-147	111.6 pcf	15.0%
B-153	111.8 pcf	16.4%
B-163	114.6 pcf	14.5%

- Clay Soil D

<u>Boring No.</u>	<u>In-Place Density</u>	<u>Natural Moisture</u>
B-124	108.9 pcf	17.5%
B-143	107.3 pcf	19.4%
B-150	111.1 pcf	17.6%
B-166	106.1 pcf	16.8%

- Clay Soil E

<u>Boring No.</u>	<u>In-Place Density</u>	<u>Natural Moisture</u>
B-112	127.1 pcf	11.2%
B-134	120.2 pcf	14.0%
B-154	124.8 pcf	11.9%
B-167	122.4 pcf	11.9%

- Clay Soil F

<u>Boring No.</u>	<u>In-Place Density</u>	<u>Natural Moisture</u>
B-123	115.2 pcf	17.3%
B-132	118.8 pcf	14.2%
B-133	117.0 pcf	15.5%
B-148	116.2 pcf	14.8%

The compaction criteria for the cover is a density greater than or equal to 90% of Standard Proctor Density. The 90% density values for each soil type are as follows: Clay Soil A, 101.2 pcf; Clay Soil B, 103.4 pcf; Clay Soil C, 103.7 pcf; Clay Soil D, 103.0 pcf; Clay Soil E, 107.6 pcf; Clay Soil F, 104.3 pcf. Thus, in-place densities at all 25 boring locations exceed the compaction criteria. Natural moisture contents are generally greater than optimum moisture values, which is both desirable and favorable for cover performance.

Permeability Demonstration

Permeability tests were performed on recompact samples of each clay soil type. The permeability data for each soil type are as follows: Clay Soil A, 4.6×10^{-8} cm/sec; Clay Soil B, 9.6×10^{-9} cm/sec; Clay Soil C, 1.6×10^{-8} cm/sec; Clay Soil D, 7.4×10^{-8} cm/sec; Clay Soil E, 3.6×10^{-8} cm/sec; Clay Soil F, 8.7×10^{-9} cm/sec. These values exceed (are less than) the 1×10^{-7} cm/sec criteria specified in the Illinois EPA letter of 9 June 1988.

Summary and Conclusion

The testing program showed that there is at least two feet of clay at the 25 boring locations included in this addendum. Laboratory testing showed that there were six distinct clay soils -- all classified as CL -- within the tested area, that in-place densities exceed the 90% Standard Proctor Density criteria for compaction at all 25 locations, and that representative permabilities for all six soil types exceed the 1×10^{-7} cm/sec criteria for hydraulic performance.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

Page 1 of 2

RECORD CODE
L P C S M O I

TRANS CODE
A

ROUTINE GROUNDWATER

REPORT DUE DATE 01/15/90
M M D Y

FEDERAL ID NUMBER

SITE INVENTORY NUMBER 0311020001	MONITOR POINT NUMBER G102
REGION H CO. Cook	DATE COLLECTED 10/22/90
FACILITY NAME Krohn Dev. Corp. Landfill	

FOR IEPA USE ONLY

LAB

DATE RECEIVED 01/15/91
M M D Y

BACKGROUND SAMPLE CO TIME COLLECTED 11:45
(see Instructions)

UNABLE TO COLLECT SAMPLE
(see Instructions)

MONITOR POINT SAMPLED BY B
(see Instructions)

OTHER (SPECIFY)

SAMPLE FIELD FILTERED — INORGANICS CO X ORGANICS CO

SAMPLE APPEARANCE

COLLECTOR COMMENTS

LAB COMMENTS

RECORD CODE L P C S M O I

TRANS CODE A (COLUMNS 8-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Remarks See Inst.	Replicate Replicate	< >	VALUE
Q	TEMP OF WATER (unfiltered °F)	00011				56.
Q	SPEC COND (unfiltered umhos)	00094				3000.
Q	pH (unfiltered units)	00400				6.84
Q	ELEV OF GW SURF (ft ref MSL)	71993				628.21
Q	DEPTH TO WATER (ft below LS)	72019				15.55
A	BTM OF WELL ELEV (ft ref MSL)	72020				617.66
Q	DEPTH TO WATER FR MEAS PT (ft)	72109				18.28
	JAN 17 1991					
	IEPA-DLPC					

This Agency is authorized to require this information under Illinois Revised Statutes, 1978, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues a fine up to \$1,000.00 and imprisonment up to one year. This form has been approved by the Permit Management Center. *Only Krypton with Date in Column 28 or Column 35-47

CHEMICAL ANALYSIS FORM

Page ____ of ____

L	P	C	S	M	O	2
1						1

TRANS CODE A

SITE INVENTORY NUMBER 0 3 1 1 0 2 0 0 0 1

MONITOR POINT NUMBER G102 _ _

co. Cook

DATE COLLECTED 10/22/90

Krohn Dev. Corp. Landfill

LAB _____

FACILITY NAME

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

***Only Key Punch with Data in Column 35 or Columns 38-47**

GARDNER, CARTON & DOUGLAS

SUITE 3400-QUAKER TOWER

321 NORTH CLARK STREET

CHICAGO, ILLINOIS 60610-4795

(312) 644-3000

TELECOPIER: (312) 644-3381

(312) 644-3382

TELEX: 25-3628

April 12, 1988

WASHINGTON, D.C.

LIBERTYVILLE, ILLINOIS

DENVER, COLORADO

DALLAS TEXAS

WRITER'S DIRECT DIAL NUMBER

(312) 245-8724

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Angela Aye Tin
Illinois Environmental Protection Agency
Environmental Protection Specialist
Permit Section - Industrial Unit
Division of Water Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Re: Krohn Development Corporation Landfill,
Site Inventory No. 0311020001 - *Cook Co.*
Submission of April 15, 1988 Quarterly
Groundwater Monitoring Sampling Results

Dear Ms. Tin:

Enclosed are the completed Illinois Environmental Protection Agency - Division of Land Pollution Control's Chemical Analysis Forms for the Krohn Development Corporation's landfill which contain the quarterly groundwater monitoring sampling results for samples collected on February 25, 1988. Samples were collected and analyzed from all seven of the groundwater monitoring wells installed at the landfill, denoted by well numbers G102, G103, G104, G105, G106, G107 and G108.

Please call me should you have any questions concerning the enclosed materials or if you need any additional information.

Very truly yours,

Susan M. Franzetti
Susan M. Franzetti

SMF/kw

cc: Richard Krohn - President - wo/encl.
Krohn Development Corporation

RECEIVED

APR 14 1988

IEPA-DLRQ

(FB

*only G102 for '88 is
attached, Monitoring
wells G102, G103,
G104, G105, G106, G107,
G108 sampled thru
1710
G102
w/ 40 is protected also*

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

AGENCY USE ONLY

Page 1 of 2

RECORD CODE L P C S M O I TRANS CODE A
 REPORT DUE DATE 07/15/88 FEDERAL ID NUMBER _____
 36 M D Y 41

SITE INVENTORY NUMBER <u>0311020001</u> 9 18	MONITOR POINT NUMBER <u>G102</u> 19 22 (see Instructions)
REGION <u>N</u> CO. <u>COOK</u> Krohn Dev. Corp. Landfill/Krohn Dev. Corp.	DATE COLLECTED <u>05/24/88</u> 23 M D Y 28
LOCATION _____	IEPA LAB (x or Blank) <u>29</u> (see Instructions)
RESPONSIBLE PARTY _____	

FOR IEPA USE ONLY	COMPLAINT NO. _____
DATE RECEIVED <u>07/15/88</u> 42 M D Y 47	
SAMPLING PURPOSE CODE <u>48</u> (see Instructions)	
TIME CARD	
PROGRAM CODE <u>49</u> — — <u>52</u> & UNIT CODE <u>53</u>	

BACKGROUND SAMPLE (X) 54 TIME COLLECTED 11:20
 (24 HR CLOCK) 55 H M 58

UNABLE TO COLLECT SAMPLE 59
 (see Instructions)

MONITOR POINT SAMPLED BY B OTHER (SPECIFY) _____
 (see Instructions) 60

SAMPLE FIELD FILTERED - INORGANICS (X) X ORGANICS (X) _____
 61 62

SAMPLE APPEARANCE CLEAR 63

COLLECTOR COMMENTS 102
 103
 142

SPECIAL INSTRUCTIONS TO LAB _____

R. Kalicki RCK NET MIDWEST R. Kalicki NET MIDWEST
 COLLECTED BY INITIALS DIVISION OR COMPANY TRANSPORTED BY DIVISION OR COMPANY

LAB SAMPLE NO. <u>63738</u>	LAB NAME <u>AQUALAB INC.</u>	LAB ID NO. <u>9193</u> 146 149
DATE RECEIVED <u>5/24/88</u>	AND ADDRESS <u>850 West Bartlett Road</u>	
TIME RECEIVED <u>1645</u>	<u>Bartlett, IL 60103</u>	
SAMPLE TEMP OKAY <u>Y</u>	SAMPLE PROPERLY PRESERVED <u>Y</u>	DATE COMPLETED <u>07/7/88</u> FORWARD <u>7/7/88</u>
LAB COMMENTS <u>150</u>		
		<u>J. Stoffer</u> 199
SUPERVISOR SIGNATURE		

RECORD CODE L P C S M O I TRANS CODE A (Columns 9-29 from above)

FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE				STORET NUMBER	RE S E R V O I R	RE P L I C A T E	< OR >	VALUE	REPORTING LEVEL			
									DRIFT TO L OR R	LINE # IN OPI FINAL		
X	DEPTH TO WATER (ft. below LS)	507F	7 2 0 1 9	30	34	35	36	37	38	47	1	R
X	ELEVATION OF GW SURFACE (ft. ref MSL)	508F	7 1 9 9 3								1	R
X	TOTAL WELL DEPTH (ft. below LS)	509F	7 2 0 0 8								1	R
	ALKALINITY TOTAL (mg/l as CaCO3) - Field	505F	0 0 4 3 1									
	REDOX POTENTIAL (millivolt) - Field	506F	0 0 0 9 0									
X	pH (units) - Field	500F	0 0 4 0 0								1	R
X	SPEC CONDUCTANCE (umhos) - Field	503F	0 0 0 9 4								2	L
X	TEMP OF WATER SAMPLE (°F) - Field	502E	0 0 0 1 0								1	L

FB

RECEIVED
 JUL 18 1988

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues, a fine up to \$3000 and imprisonment up to one year. This form has been approved by the Forms Management Center.

ID CODE L P C S M O 2

TRANS CODE A

INVENTORY NUMBER 0 3 1 1 0 2 0 0 0 1

MONITOR POINT NUMBER G 1 0 2

REGION N CO. COOK

DATE COLLECTED 05/24/88

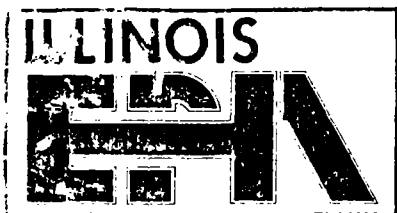
Krohn Dev. Corp. Landfill

IEPA LAB (x or Blank) 29

FACILITY NAME

GROUNDWATER
MONITORING
WELLS

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	< OR >	VALUE	REPORTING LEVEL	
					DEPTH TO L OR B	LINE # OF MEASUREMENT
* X	119T COD, MG/L	0 0 3 3 5		11.9	1	L
X	100T PH, LAB - SU	0 0 4 0 3		6.61	2	R
X	103T ALKALINITY AS CaCO3 MG/L	0 0 4 1 0		1110	2	L
X	111D AMMONIA NITROGEN, DISS MG/L	0 0 6 0 8		115	1	L
X	110D NITRITE + NITRATE, DISS MG/L	0 0 6 3 1	<	0.05	2	R
X	116T CYANIDE, TOT MG/L AS CN	0 0 7 2 0		0.002	3	R
X	160D SODIUM, DISS MG/L AS NA	0 0 9 3 0		266	1	L
X	108D CHLORIDE, DISS MG/L AS CL	0 0 9 4 1		350	1	L
X	109D SULFATE, DISS MG/L AS SO4	0 0 9 4 6	<	2	1	L
X	107D FLUORIDE, DISS MG/L AS F	0 0 9 5 0		0.3	1	R
X	144D ARSENIC, DISS UG/L AS AS	0 1 0 0 0		3	1	L
X	145D BARIUM, DISS UG/L AS BA	0 1 0 0 5		390	2	L
X	106D BORON, DISS UG/L AS B	0 1 0 2 0		1660	2	L
X	146D CADMIUM, DISS UG/L AS CD	0 1 0 2 5	<	1	1	L
X	147D CHROMIUM, DISS UG/L AS CR	0 1 0 3 0	<	1	1	L
X	149D COPPER, DISS UG/L AS CU	0 1 0 4 0		5	1	L
X	150D IRON, DISS UG/L AS FE	0 1 0 4 6		720	2	L
X	151D LEAD, DISS UG/L AS PB	0 1 0 4 9	<	10	2	L
X	152D MANGANESE, DISS UG/L AS MN	0 1 0 5 6		69	1	L
X	154D NICKEL, DISS UG/L AS NI	0 1 0 6 5		20	2	L
X	156D SILVER, DISS UG/L AS AG	0 1 0 7 5	<	1	1	L
X	157D ZINC, DISS UG/L AS ZN	0 1 0 9 0		57	1	L
X	155D SELENIUM, DISS UG/L AS SE	0 1 1 4 5	<	1	1	L
X	112T PHENOLS TOTAL UG/L	3 2 7 3 0	<	4	1	L
X	102T RESIDUE ON EVA.-180°C MG/L	7 0 3 0 0		1640	2	L
X	153D MERCURY, DISS UG/L AS HG	7 1 8 9 0	<	0.1	1	R



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

312/345-9780

CERTIFIED MAIL

Refer to: 03110201 - Cook County - Glenview/Krohn

November 30, 1982

Mr. Richard Krohn
P.O. Box 30041
Chicago, Illinois 60630

Dear Mr. Krohn:

Your solid waste disposal facility located at the intersection of John Street and Chestnut Avenue in Glenview, Illinois was inspected on September 27, 1982, by Glenn Sternard and Donald Gimbel, representing this Agency.

The investigation disclosed the following condition(s) which constitute violations of the Illinois Environmental Protection Act and Chapter 7 of the Illinois Pollution Control Board Rules and Regulations on Solid Waste:

- 1) Leachate was observed flowing and ponded on site and leaving the site, entering the North Branch of the Chicago River (southeast portion of site). Your permit states that "All leachate emergence from the site shall be controlled by prompt application of additional soil, spread's compacted and reseeded as necessary to prevent erosion.
- 2) No equipment operator is present on site to spread and compact the received materials at acceptable intervals.
- 3) Piles of demolition debris, concrete and asphalt were present over the majority of the site. All piles of received material not intended for road use should be spread and compacted.
- 4) Putrescible waste (wood demolition, railroad ties) was observed on site. This site has not been permitted to accept such waste and the material should be removed.

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DEC -2 1982

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

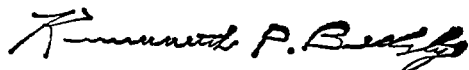
EXHIBIT C-3

Please submit in writing, within ten (10) days of receipt of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps which have been initiated to prevent any further recurrence of the above-cited violations. This information should be sent to the following:

Mr. Kenneth P. Bechely, Northern Region Manager
Illinois Environmental Protection Agency
Division of Land Pollution Control
Field Operations Section
1701 So. First Avenue - Suite 600
Maywood, Illinois 60153

Further, take notice that noncompliance with the requirements of the Illinois Environmental Protection Act and Chapter 7 of the Illinois Pollution Control Board Rules and Regulations may be the subject of enforcement action pursuant to the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq.

Sincerely,



Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:GJS:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
William J. Stanley, William J. Stanley & Associates, Inc.
Larry Kulman, Village of Glenview

1988-281

P 131 205 934

File



Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0311020001 -- Cook County
Krohn Landfill (Lutter Brick Landfill)
Log No. 1988-281
Permit File

April 19, 1989

Douglas Rathe
Assistant Attorney General
Environmental Control Division
100 West Randolph Street, 12th Floor
Chicago, Illinois 60601

Dear Mr. Rathe:

This is to provide you with written confirmation that the installation of the gas vents/trench at Krohn Landfill is acceptable to this Agency. A description of the construction of the vents and trench was included with Permit Application No. 1988-281 and clarified with information prepared by Edward G. Need of Weston dated February 7, 1989.

When additional information on other aspects of Application No. 1988-281 is received, the construction of the vents and trench will be formally approved as part of a supplemental permit. Currently the final review date for Application No. 1988-281 is May 10, 1989.

If you have any further questions regarding this matter, please do not hesitate to contact me at 217/782-6762.

Sincerely,

Christian J. Liebman

Christian J. Liebman
Solid Waste/UIC Unit
Permit Section
Division of Land Pollution Control

CJL:lab/1308k, 61

cc: Division File ✓
Maywood Region
Don Gimbel
Susan M. Franzetti of Garder, Carton & Douglas
Edward A. Need of Weston



100 CORPORATE NORTH, SUITE 101
ROUTE 22 AND LAKESIDE DRIVE
BANNOCKBURN, ILLINOIS 60015
(312) 295-6020

7 February 1989

BY TELECOPIER

Mr. Chris Liebman
Permit Section - DLPC
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

W.O.No.: 2904-04-02

SUBJECT: Clarification of Gas Vent/Trench
Installation at Krohn Landfill

Dear Mr. Liebman:

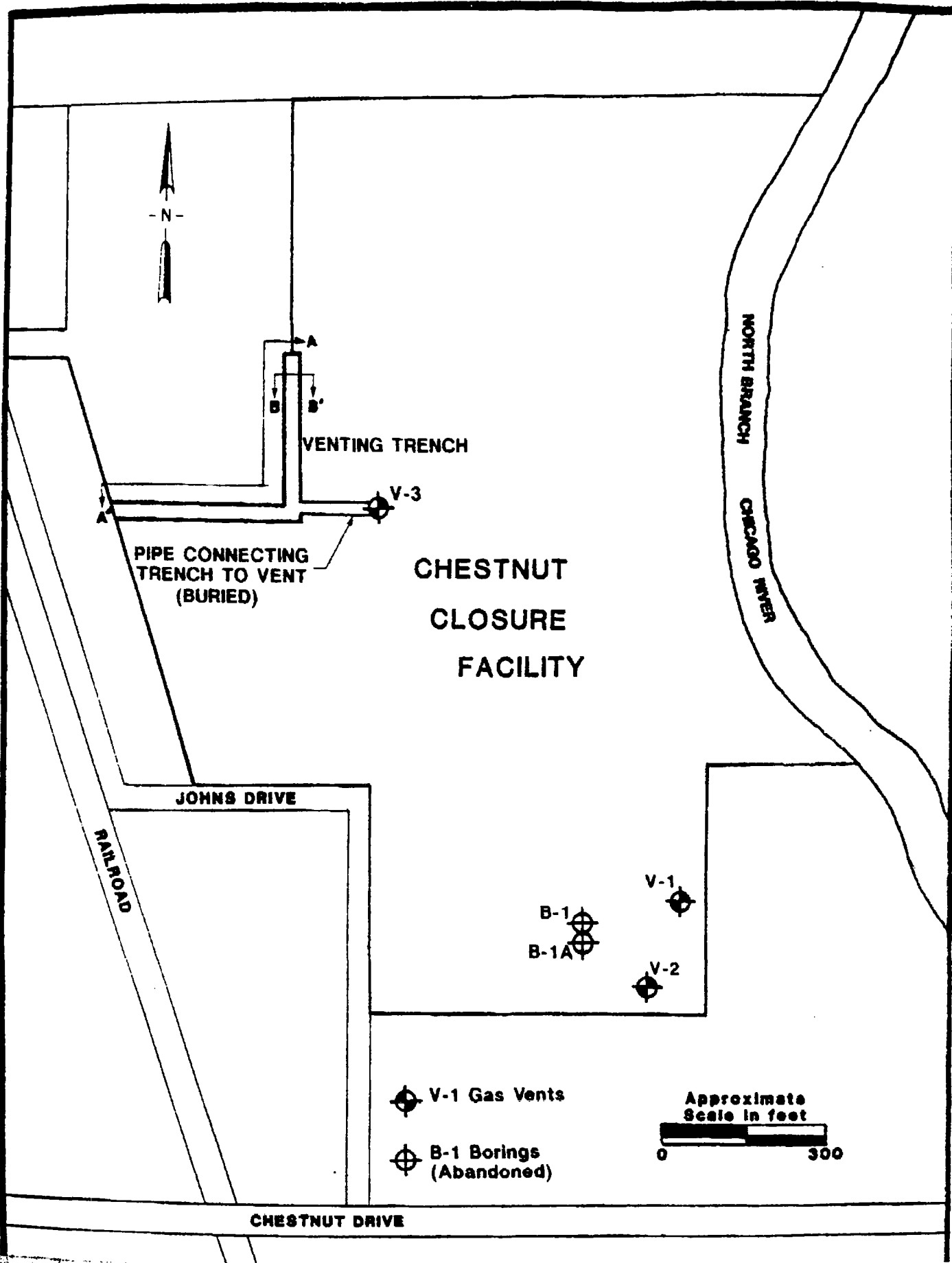
This letter is to clarify several aspects of the gas vent and trench installation at the Krohn Landfill (a.k.a. The Chesnut Closure Facility) pursuant to our telephone conversation with Susan Franzetti (Gardner, Carton & Douglas) and Douglas Rathe (Office of the Attorney General) on 3 February 1989.

Placement of Gas Vents in Southern Part of Landfill

As discussed in WESTON's 1 August 1988 letter to Mr. John Krohn, WESTON installed only two vents in the southern part of the landfill, instead of three vents as proposed in the IEPA-approved plans. This decision was based on conditions encountered in the field as described below:

o Vent V-1

Drilling started at this location, consistent with eastern-most location shown in plans; gas was encountered and a vent was installed.



Krohn Development Corporation

950 Milwaukee Avenue
Glenview, Illinois 60025

COUNTY OF COOK)
) ss.
STATE OF ILLINIOS)

CERTIFICATION OF RICHARD KROHN

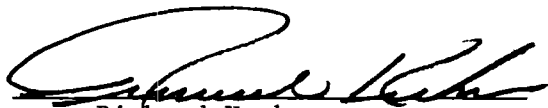
I, Richard Krohn, President of Krohn Development Corporation, and its duly authorized representative, hereby certify that Krohn Development Corporation has obtained and located on the site of the Chestnut Closure Facility sufficient final cover and vegetative layer material to effect the closure of the entire facility. I further certify that all of Phase Four (4) and Phase Three (3) have been seeded; that a portion of Phase Two (2) has been seeded and that sufficient seed has been purchased to seed the remainder of the facility, as evidenced by the attached receipt of purchase dated April 28, 1989.

I hereby certify that the above statements are true and accurate to the best of my knowledge, information and belief.

DATED: May 2, 1989

KROHN DEVELOPMENT CORP.

By:

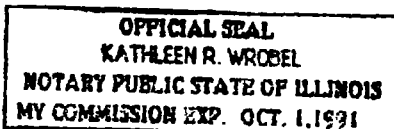


Richard Krohn
President

Subscribed and sworn to
before me this 2nd day
of May, 1989.



Notary Public



0311020001

GARDNER, CARTON & DOUGLAS

SUITE 3400-QUAKER TOWER

321 NORTH CLARK STREET

CHICAGO, ILLINOIS 60610-4795

(312) 644-3000

TELEX: 25-3628

TELECOPIER: (312) 644-3381

WASHINGTON, D.C.

LIBERTYVILLE, ILLINOIS

SOUTHFIELD, MICHIGAN

DENVER, COLORADO

WRITER'S DIRECT DIAL NUMBER

(312) 245-8724

June 30, 1989

X

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Illinois Environmental Protection Agency
Division of Land Pollution Control
#24
Field Operations Section
Glen Savage, Manager
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: 0311020001--Cook County
Glenview/Krohn
Compliance File

Dear Mr. Savage:

I am writing to respond to your Compliance Inquiry Letter dated June 16, 1989 to Richard Krohn and Parkway Bank & Trust No. 6720. In the Inspection Report dated June 5, 1989 attached to your June 16, 1989 letter, three apparent violations are noted: (1) conducting a sanitary landfill operation in a manner which results in leachate flow entering waters of the state (line 20); (2) conducting a sanitary landfill operation in a manner which results in leachate flows exiting the landfill confines (line 21); and (3) inadequate measures to monitor and control leachate (line 26).

As noted in the Inspection Report, the subject landfill is currently closed and undergoing final cover and closure operations. On the day of inspection, no closure activity was ongoing due to the inoperable status of the equipment with which the closure operations are effected. Nevertheless, as noted by your inspector, Donna Czech, two employees of the landfill, Joseph Pierro and John Krohn, arrived at the site before your inspector had departed. Messrs. Pierro and Krohn had arrived at the site for the purpose of conducting a regular

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JUL 5 1989

IEPA/DLPC

inspection of the landfill in order to determine, among other things, that no leachate flows were present on the site. Inspections of the landfill to control and monitor leachate flows are a part of the regular duties of these landfill employees. Moreover, the landfill employees operating the equipment with which the closure operations are being conducted have been expressly instructed to observe and monitor the landfill during these operations and to attend to any leachate flows. Accordingly, we do contest the cited observation that there are inadequate measures to monitor and control leachate.

With respect to the cited observations that the landfill is being conducted in a manner which results in leachate flow entering waters of the state and exiting the landfill, we do not see any basis in the inspector's report for this citation. The landfill is undergoing proper closure procedures. As noted by the Inspection Report, certain areas of the site have already been seeded and vegetation in these areas is fairly well developed. The report also notes that the general condition of the site's final cover appears adequate. There is simply no evidence from the inspector's report that shows that methods of operation are causing leachate flows. In fact, as above-stated, part of the landfill closure operations do include regular inspections of the site to monitor and control leachate flows. We accordingly contest the allegation that the landfill is being operated in a manner which results in leachate flows either entering waters of the state or exiting the landfill.

With respect to the inspector's observation of a leachate flow near the entrance road on the west side of the site, this is the first time that a leachate seep has been observed in this area. It has been controlled by reapplying suitable cover material to and re-compacting this location. Our employees have also been directed to pay particular attention to this area of the site when conducting future monitoring of leachate flows. A leachate flow in this area is surprising given the fact that the landfill is no longer accepting waste and hence regular truck traffic in this area which might disturb the cover material no longer occurs. We do wish to point out that Messrs. Pierro and Krohn do contest the description of this leachate seep as running over the curb and into the storm sewer on Johns Drive.

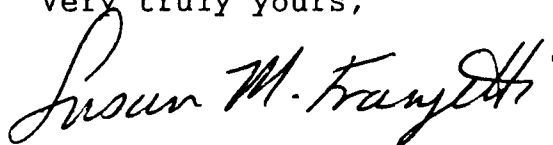
With respect to the two leachate seeps along the south side slope of the landfill, you should be aware that this is in close proximity to the area in which we have recently installed additional groundwater monitoring wells at the Agency's

Illinois Environmental Protection Agency
June 30, 1989
Page 3

request. It is possible that the process of installing these wells resulted in disturbances to the underlying soil and fill area gave rise to the development of these leachate seeps. In any event, that groundwater monitoring well installation work has been completed and the two seeps identified by your inspector have been remedied by digging up the area and reapplying and compacting sufficient cover material.

We respectfully submit that the above submitted information supports a resolution of this compliance inquiry without any further action necessary by the Agency. If you require or desire any additional information or further details concerning the information provided above, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in cursive script, reading "Susan M. Franzetti". The signature is written in dark ink and is positioned above the printed name.

Susan M. Franzetti

SMF/kw